

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ARISTA RECORDS LLC; ATLANTIC  
RECORDING CORPORATION; ARISTA  
MUSIC, fka BMG MUSIC; CAPITOL  
RECORDS, INC.; ELEKTRA  
ENTERTAINMENT GROUP INC.;  
INTERSCOPE RECORDS; LAFACE  
RECORDS LLC; MOTOWN RECORD  
COMPANY, L.P.; PRIORITY RECORDS LLC;  
SONY MUSIC ENTERTAINMENT, fka SONY  
BMG MUSIC ENTERTAINMENT; UMG  
RECORDINGS, INC.; VIRGIN RECORDS  
AMERICA, INC.; and WARNER BROS.  
RECORDS INC.,

Plaintiffs,

v.

LIME GROUP LLC; LIME WIRE LLC; MARK  
GORTON; GREG BILDSON; and M.J.G. LIME  
WIRE FAMILY LIMITED PARTNERSHIP,

Defendants.

ECF Case

06 CV 5936 (KMW)(DF)

**DEFENDANTS' NOTICE OF MOTION  
AND MOTION TO FILE CONFIDENTIAL MATERIAL UNDER SEAL**

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*Attorneys for Defendants*

Dated: January 24, 2011

NOTICE TO THE COURT, PLAINTIFFS AND THEIR COUNSEL OF  
RECORD:

On January 6, 2011, the Court entered an Amended Stipulation and Protective Order (the “Amended Protective Order”), a copy of which is on file with the Court (ECF No. 400). Paragraph 15 of the Amended Protective Order requires a party submitting Confidential or Confidential-Attorneys’ Eyes Only material to the Court to file such material under seal to protect it from disclosure.

Pursuant to the Amended Protective Order, Defendants Lime Group LLC, Lime Wire LLC, Mark Gorton, and M.J.G. Lime Wire Family Limited Partnership (collectively, “Defendants”) hereby move this Court to place under seal, until further order of this Court, the following documents:

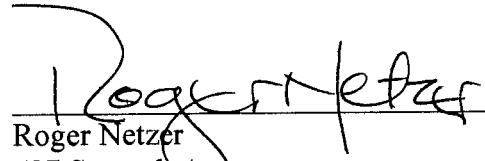
- Defendants’ Memorandum of Law in Opposition to Plaintiffs’ Motion to Disqualify (unredacted, confidential version);
- Declaration of Todd G. Cosenza, executed January 24, 2011;
- Declaration of Jeffrey R. Farmer, executed January 24, 2011;
- Declaration of Jeffrey B. Korn, executed January 24, 2011;
- Declaration of Francis J. Menton, Jr., executed January 24, 2011.
- Declaration of Tariq Mundiya, executed January 24, 2011; and,
- Declaration of Roger Netzer, executed January 24, 2011 (unredacted, confidential version).

These documents have been designated by the parties as either Confidential or Confidential-Attorneys’ Eyes Only under the Amended Protective Order. Accordingly, Defendants respectfully request that the above-listed documents be maintained under seal until further order of this Court.

Dated: January 24, 2011

Respectfully submitted,

WILLKIE FARR & GALLAGHER LLP

A handwritten signature in black ink, appearing to read "Roger Netzer", is written over a horizontal line.

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